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August 28, 2015

BY ECF

Emily Cummings, AUSA  
U.S. Attorney's Office  
1 Courthouse Way, 9<sup>th</sup> Floor  
Boston, MA 02210

Re: United States v. Arthur Williams  
Case No. 1:15-cr-10145-RGS

Dear Emily,

By this letter, I am essentially copying all of the requests made to you in the letter of Attorney John Swormley on behalf of his client Demetrius Williams.

Please have your office provide automatic discovery. Mr. Arthur Williams has received no automatic discovery since his initial appearance in the case. I have received from you a dropbox containing some discovery but, pursuant to our temporary agreement subject to pending court rulings, I have not provided any of this discovery to my client. I therefore urge that the discovery be provided on compact disks with all .pdf files to be watermarked with the name of my client, Arthur Williams. Please send one set of disks to my office and another to the Norfolk County House of Correction where my client is lodged. Please note that my client is the only codefendant in this massive case that is lodged at that institution. Please note that I have encountered difficulty in the use of the dropbox and cannot read the voluminous materials on the computer, and furthermore, cannot cause these items to be printed as I do not know whether or not I need to make just one copy for myself or a second copy for the client.

I have already agreed to an order prohibiting the dissemination of copies to anyone and, as I have no staff that will be presently involved in this matter, no material will be disclosed to anyone else. I expect that Arthur Williams will be provided watermarked copies of discovery pending the Court's determination on his oppositions and given access as provided by the Norfolk County House of Correction to its computers for reviewing the discovery materials. Please note that nothing in the foregoing limits the disclosure by the Government of specific discovery materials for the preparation of the defense

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It is my understanding that the Government wishes to use cloud storage and downloading of discovery files. I object and cannot do so. I am not able to utilize the computer in such a sophisticated way. I have never been able to access cloud storage and do not know how to utilize it. Like Mr. Swormley, I cannot watermark 8000 pages of material. I do not know how to watermark. I am one of three attorneys in my office that is staffed with one secretary who does principally billing, financial work and obtaining of medical records. Even if the Court would approve the excessive use of CJA funds, I simply have no staff to accomplish this Herculean task. Since the government creates and maintains these files and has a system administrator to access them on their servers, it can watermark files more efficiently. I am not sufficiently knowledgeable about cloud to understand Attorney Swormley's objection to its use but I adopt his objection.

I hope that you accept, and comply with, the terms of this letter.

Sincerely,

s/James B. Krasnoo  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants via first class mail, postage prepaid, on August 28, 2015.

/s/ James B. Krasnoo  
James B. Krasnoo